

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

2013 MAY -7 PM 2:48

DEPUTY CLERK T. Q. Her

UNITED STATES OF AMERICA

v.

DALTON BRADSHAW (01)
RAVEN CROSSLIN (02)
DAVID ARCE (03)
LESLEY SANCHEZ (04)
LAURA RODRIGUEZ (05)
LEE JONES (06)
KENNETH PAGAN (07)
ALEX PRADO (08)
IVAN ROJAS (09)

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No.

3 - 13CR-155-M

INDICTMENT

The Grand Jury Charges:

Count One

Possession of Stolen Firearms

(Violation of 18 U.S.C. §§ 922(j), 924(a)(2) and 2)

On or about February 19, 2013, in the Northern District of Texas, the defendants, **Dalton Bradshaw, Raven Crosslin, David Arce, Lesley Sanchez, Laura Rodriguez, Lee Jones, Kenneth Pagan, Alex Prado and Ivan Rojas**, while aiding, abetting, counseling, commanding, inducing, and procuring one another, knowingly possessed, received, sold and disposed of stolen firearms, that is, a Colt, Model 16A2, 5.56mm machine gun, a H&K, Model MP5SD, 9mm machine gun, a H&K, Model MP7A1, 4.6mm machine gun, a RPB, Model M11, .380 machine gun, a RPB, Model

M10, .45 machine gun, a John Norrel Arms, Model 22, .22 silencer, a Ruger, Model 10/22, .22 rifle, a Colt, Model Defender, .45 pistol, a Beretta, Model 92FS, 9mm pistol, a Sig Sauer, Model p238, .380 pistol, and a Kimber, Model Ultra Elite, .45 pistol, which have been shipped and transported in interstate and foreign commerce, knowing or having reasonable cause to believe the firearms were stolen.

In violation of Title 18 U.S.C. §§ 922(j) and 924(a)(2) and 2.

Count Two
Conspiracy to Steal Firearms
(Violation of 18 U.S.C. § 371)

On or about February 19, 2013, in the Dallas Division of the Northern District of Texas, defendants, **Dalton Bradshaw, Raven Crosslin, David Arce, Lesley Sanchez, Laura Rodriguez** did knowingly, intentionally and unlawfully combine, conspire, confederate, and agree together, to commit a certain offense against the United States, to-wit: stealing firearms which have moved in interstate or foreign commerce, in violation of 18 U.S.C. § 924(l).

In violation of 18 U.S.C. § 371.

Count Three
Possession of a Firearm
Bearing a Removed or Obliterated Serial Number
(Violation of 18 U.S.C. §§ 922(k), 924(a)(1)(B))

On or about March 29, 2013, in the Dallas Division of the Northern District of Texas, the defendants, **Kenneth Pagan**, did knowingly possess a firearm, to wit: a Smith and Wesson, Model 9VE, 9mm pistol, which had the importer's or manufacturer's serial numbers removed, altered and obliterated and had at any time been shipped and transported in interstate and foreign commerce.

In violation of 18 U.S.C. §§ 922(k), 924(a)(1)(B).

A TRUE BILL



FOREPERSON

SARAH R. SALDAÑA
UNITED STATES ATTORNEY



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INDICTMENT

18 U.S.C. §§ 922(j), 924(a)(2) and 2
Possession of Stolen Firearms

18 U.S.C. § 371
Conspiracy to Steal Firearms

18 U.S.C. §§ 922(k), 924(a)(1)(B)
Possession of a Firearm
Bearing a Removed or Obliterated Serial Number

3 Counts

A true bill rendered

DALLAS



FOREPERSON

Filed in open court this 7 day of May 2013.

Clerk

Warrants to be Issued on all defendants

UNITED STATES DISTRICT/MAGISTRATE JUDGE

No Criminal matter pending